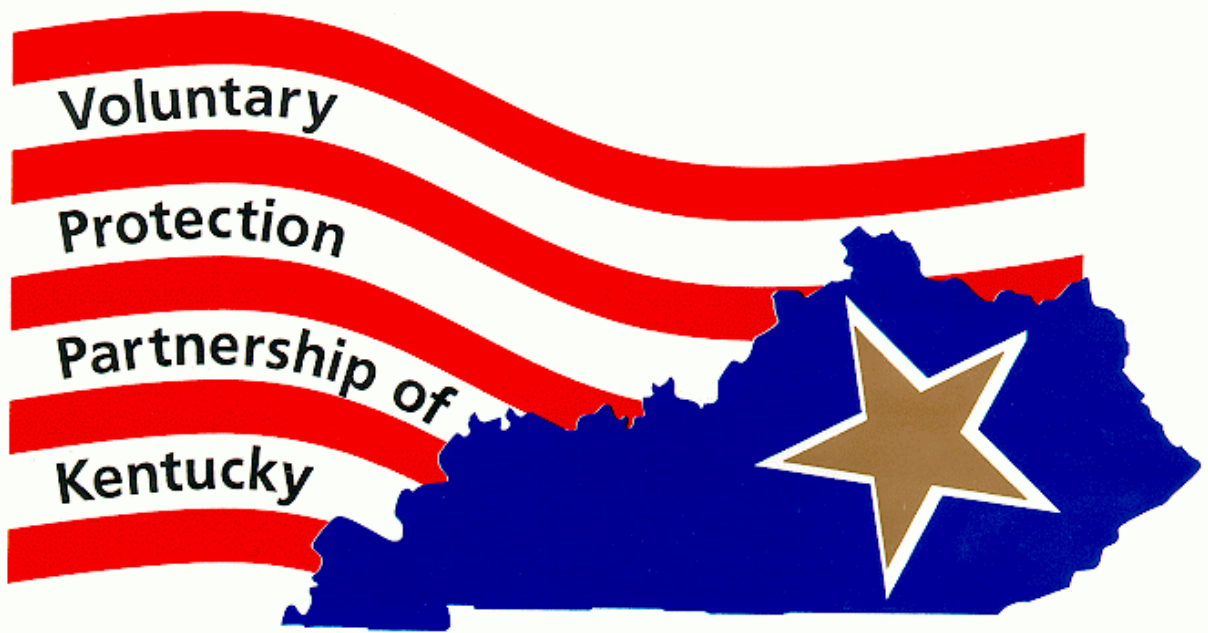


The Kentucky Voluntary Protection Partnership Program



Labor, Management and KY OSH Working Together

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I. VOLUNTARY PROTECTION PROGRAM (VPP)

A. PURPOSE

Kentucky OSH has long recognized that compliance with occupational safety and health standards alone cannot accomplish all the goals of the OSH Act. The standards, no matter how carefully conceived and developed, will never cover all unsafe and unhealthful activities and conditions.

Furthermore, limited resources will never permit regular or exhaustive inspections of all of the state's workplaces. But most importantly, no amount of standard setting and enforcement can replace the understanding of work processes, materials, and hazards that come with employer's and employees day-to-day, on-the-job experience. This knowledge, combined with the ability to evaluate and address hazards rapidly and to reward positive action, places employers in a unique position to improve workplace safety and health in ways simply not available to Kentucky OSH.

The purpose of the VPP is to emphasize the importance of, encourage the improvement of, and recognize excellence in employer-provided, employee-participative, generally site-specific occupational safety and health programs. These programs are comprised of management systems for preventing or controlling occupational hazards. The systems not only ensure that Kentucky OSH's standards are met, but, using flexibility and creativity in striving for excellence, go beyond the standards to provide the best feasible protection for workers at that site. In the process, these work sites serves as models for effective safety and health programs in their industries.

Work sites in the VPP are removed from programmed inspection lists for the duration of their participation. This frees Kentucky OSH's inspection resources for visits to establishments that are less likely to meet the requirements of the Kentucky OSH standards. VPP participants enter into a new relationship with Kentucky OSH, one in which safety and

health problems can be approached cooperatively when and if they arise.

Participation does not diminish existing employer and employee rights and responsibilities under the Act. In particular, OSHA does not intend to increase the liability of any party in an approved VPP site. Employees or any representative of employees taking part in a Kentucky OSH-approved VPP safety and health program are not assuming the employer's statutory or common law responsibility for providing safe and healthful workplaces or undertaking in any way to guarantee a safe and healthful work environment.

The program is voluntary in the sense that no employer is required to participate and any employer in Standard Industrial Code (SIC) 20-39 may choose to apply. Compliance with Kentucky OSH standards and applicable laws remains mandatory. Achievement and maintenance of the requirements of the program are continuing conditions of participation.

Approval for participation is determined by the VPP Program Administrator, Division of Education and Training.

II. PROGRAM DESCRIPTION

A. General

VPP is a voluntary program that provides recognition to qualified employers and removes these "recognized employers" from programmed inspection lists. The VPP emphasizes the importance of work site safety and health management systems in meeting the goals of the "Act" to assure so far as possible every working man and woman in the state safe and healthful working conditions... " This emphasis is demonstrated through assistance to employers in the efforts to reach the VPP level of excellence; through cooperation among problems; and through official recognition of excellent safety and health programs. VPP sites are not expected to be

perfect, but they are expected to effectively protect their workers from the hazards of the workplace through their safety and health programs.

VPP is for work sites that are able to function independently of Kentucky OSH and are self-sufficient in their ability to control hazards at the work site.

B. Recognition

By approving an applicant for participation in VPP, Kentucky OSH recognizes that the applicant is providing, at a minimum, the basic elements of ongoing, systematic protection of workers at the site. This makes routine Kentucky OSH enforcement efforts unnecessary. The symbols of recognition are certificates of approval and flags. The participant may also choose to use program logos on such items as letterhead or awards for employee contests.

In addition to removing work sites from programmed inspection lists, Kentucky OSH shall provide the opportunity for a company to work cooperatively with the agency, both in the resolution of safety and health problems through such means as presentations before meetings of safety and health organizations. Each approved site shall have a designated Kentucky OSH contact person to handle information and assistance requests.

III. TERM OF PARTICIPATION

The term for participation as an approved VPP site is limited, contingent upon continued improvement and, favorable triennial evaluation.

IV. EXPERIENCE

All elements of the safety and health program must be in place and must have been implemented for a period of not less than 12 months before VPP approval.

V. RESULTS

The applicant, at the time of approval, must meet the following criteria:

Both the average injury incidence rates and the average lost workday case rates for each of the most recent three calendar years at the time of approval must be at or below the most recent specific industry national average (at the two, three or four digit level) as published by the U.S. Bureau of Labor Statistics.

VI. APPLICATION SUBMISSION

An application shall be submitted to the Labor Cabinet, Division of Education and Training. It is advisable to contact Kentucky VPP before making application to receive current instructions and qualifying criteria.

VII. APPLICATION WITHDRAWAL

Any applicant may withdraw a submitted application at any time after formal acceptance and before approval or denial.

Kentucky OSH may keep the copy of an accepted application for a year before discarding it, in order to knowledgeably respond should the applicant raise questions concerning the handling of the application. Once an application has been withdrawn, a new submission of an application is required to begin application review again.

If the application is substantially incomplete, and if after notification the applicant has not responded within 90 days to the request for more information, the application shall be considered unacceptable and shall be returned to the site. The site may resubmit the application when it is complete.

VIII. QUALIFICATION VERIFICATION

A. Initial Review

The initial review of the application is made to determine whether those qualifications that can be documented by paper submission has been met. The applicant shall be given the opportunity to amend the application with additional or substitute materials for the purpose of improving the application.

B. Pre-Approval On-Site Review

I. **Purpose.** The pre-approval review, which is conducted by a team of non-enforcement Kentucky OSH staff on the site for which participation has been requested, is a management review of the site safety and health program. It is conducted to:

- * Verify the information supplied in the application concerning qualification for VPP;
- * Identify the strengths and weaknesses of the site safety and health program;
- * Determine the adequacy of the safety and health program to address the potential hazards of the site;
- * Obtain information to assist the Secretary of Labor in making the approval decision.

2. **Preparation.** The review shall be arranged at the mutual convenience of Kentucky OSH and the applicant. The review team shall consist of a team leader, a back-up team leader (optional for smaller sites), and health and safety specialists as required by the size of the site and the complexity of the safety and health program.

3. **Duration of the Review.** The time required for the pre-approval review shall depend upon the size of the site and the complexity of the operation. Reviews usually average four days onsite, unless the site has complicating factors.
4. **Content.** All pre-approval reviews will include a review of injury records, recalculation of the rates submitted with the application, verification that the safety and health program described in the application has been implemented, and a general assessment of safety and health conditions to determine if the safety and health program adequately protects workers from the hazards at the site.

The review will also include interviews with relevant individuals (such as members of joint labor-management and other safety and health committees, management personnel, and randomly selected non-supervisory personnel, including contract workers).

Onsite document reviews shall include the following records (or samples of them) if they exist and are relevant to the application of the safety and health program:

- ◆ Written safety and health program;
- ◆ Management statement of commitment to safety and health;
- ◆ The OSHA 200 Log for the site and for all applicable contractor employees on the site; with appropriate back-up documentation;
- ◆ Safety and health manuals(s);
- ◆ Safety rules, emergency procedures, and examples of safe work procedures;
- ◆ The system for enforcing safety rules;
- ◆ Reports from employees of safety and health problems and documentation of the response;
- ◆ Self-inspection procedures, reports, and correction tracking;
- ◆ Accident Investigation;
- ◆ Safety and health committees minutes;
- ◆ Employee orientation and safety training programs and attendance records;

- ◆ Industrial hygiene monitoring records;
- ◆ Annual safety and health program evaluations and any site or corporate audits, including the documented follow-up activities, for at least the last 3 years;
- ◆ Preventive maintenance program;
- ◆ Accountability documentation;
- ◆ Contractor safety and health program(s); and
- ◆ Other records that provide relevant documentation of qualifications.
- ◆ Written procedures addressing compliance with Kentucky OSH Program standards.

IX. Application Approval

A. Deferred Approval

If, at the conclusion of the pre-approval review, the applicant needs to take actions to meet one or more of the requirements for approval. A reasonable time– up to 90 days– shall be allowed for those actions to be taken before a recommendation is made to the VPP Program Administrator, Division of Education and Training. Where necessary, an onsite visit shall be made to verify the actions taken after the pre-approval review visit.

B. Application Approval

If, in the opinion of the pre-approval review team, the applicant has met the qualifications requirements of the VPP, the team's recommendation shall be made to the Office of the Kentucky OSH Voluntary Programs Administrator, who, on concurrence, shall recommend approval to the Director, Division of Education and Training. Approval shall occur on the day that the Director, Division of Education and Training signs a letter informing the applicant.

X. APPLICATION DENIAL

A. Application Withdrawal Prior to Denial

1. If the applicant cannot meet the requirements for participation in the VPP or for any reason does not wish to continue the approval process, reasonable time (not to exceed 30 calendar days) shall be allowed for application withdrawal before a denial recommendation is made by the VPP Administrator.

B. Application Denial

1. If, in the opinion of the pre-approved review team, the application has not met the qualification requirements of the VPP, the team's recommendation will be made to the Director, Division of Education and Training, who on concurrence, will deny approval. A letter from the Director, Division of Education and Training, denying approval will be sent to the applicant. The denial will occur as of the date of the letter.
2. Should the Director, Division of Education and Training for any reason reject the Administrator's recommendation to approve, a letter from the Director, of Education and Training denying approval shall be sent to the applicant.
3. Should an applicant appeal a denial to the Director, Division of Education and Training, the Administrator shall forward the appeal to the Director, Division of Education and Training, along with the team's recommendation of denial and the Administrator's own recommendation.

XI. INSPECTION REQUIREMENTS

A. Programmed Inspections

1. Participating work sites shall be removed from Kentucky OSH's programmed inspection lists, including any list of sites based upon information that is industry-based rather than based upon information from that specific site, for the duration of approved participation in the VPP.

2. The applicant work site shall be removed from the programmed inspection lists discussed above no more than 75 calendar days prior to the commencement of their scheduled pre-approval is made.

B. Enforcement Activity by Kentucky OSH

Significant chemical leaks or spills, and all fatalities and catastrophes shall be handled by enforcement personnel in accordance with normal Kentucky OSH enforcement procedures.

C. Significant Accidents and Incidents

Kentucky OSH may also choose to investigate other significant accidents or incidents that come to its attention.

XII. REFERRALS

The history of VPP indicates that safety and health problems discovered during contact with work sites for VPP purposes are resolved cooperatively. Nevertheless, Kentucky OSH must reserve the right, where employee's safety and health are seriously endangered and site management refuses to correct the situation to refer the situation to the Director, Division of Compliance, for review and enforcement action.

- ❖ The employer shall be informed in advance that a referral will be made to the Director, Division of Compliance, and that enforcement action may result.
- ❖ Because companies with excellent safety and health programs that are interested in participating in VPP are not likely to refuse to address a serious problem in a cooperative spirit, a situation of this type is unlikely to occur. It is important, however, for interested employers and employees to be aware of and understand Kentucky OSH's obligation in the event that such a situation should occur.
- ❖ When a cooperative spirit does not exist between Kentucky OSH and a company, participation in VPP is not appropriate. Therefore, if a company in this situation does not choose to withdraw from consideration or participation, the VPP Program Administrator, may start proceedings to deny or terminate participation effective on the date the VPP Program Administrator, Division of Education and Training, declares the cooperative spirit not to exist.

Where there is a significant failure to maintain safety and health guidelines in accordance with VPP Program requirements, or where the systems fail to produce significant progress toward jointly-established safety and health goals or where continuation in the program will endanger workers, the union/collective bargaining agent or employee representative may request withdrawal from the program.

- ❖ The written request for withdrawal must be provided to KY OSH and the employer thirty (30) days prior to the intent to terminate participation.

- ❖ The request must reflect the agreement to mediation by the Kentucky Labor Cabinet in an effort to resolve the problem during the first fourteen (14) days of the thirty (30) days notice of the intent to terminate participation.

XIII. EVALUATION

A. The Purpose of the Evaluation is:

- ❖ To determine continued qualification for the VPP;
- ❖ To document results of program participation in terms of the evaluation criteria and other striking aspects of the site program and its results; and
- ❖ To identify any problems that have the potential to adversely affect continued VPP qualifications and to determine if those problems require additional evaluations.

B. Frequency. VPP participants shall be evaluated every three years (except when the identification of potential serious problems creates the need for an earlier evaluation). The evaluation shall include a review of injury incidence and lost workday injury case rates for the site and for its contractor employees. The rates reported shall be for each of the latest three complete calendar years and the average for each of three years preceding the Secretary of Labor's certification of the site.

C. Measures of Effectiveness. The following factors shall be used in the evaluation of VPP participants:

- ❖ Continued compliance with the program requirements;
- ❖ Satisfaction of the participants;
- ❖ Nature and validity of any complaints received by Kentucky OSH;
- ❖ Nature and resolution of problems that may have come to Kentucky OSH's attention since approval or the last evaluation; and

- ❖ The effectiveness of employee participation programs.
- ❖ Demonstrated continued improvement and evaluation of the worksite.

D. Description of Evaluation.

Kentucky OSH's evaluation of VPP participants shall consist mainly of an onsite visit similar in duration and scope of the pre-approval program review. Documentation of program implementation since pre-approval review of the previous evaluation shall be reviewed.

E. Evaluation Recommendations.

Three possible recommendations may follow a VPP evaluation visit:

1. Recommendation for continued participation in the VPP.
2. Recommendation for a one-year conditional approval to continue in the VPP. The VPP onsite review team may recommend this status if it finds that the site has allowed one or more program element to slip below VPP quality. The site must return its safety and health program to Star Quality within 90 days of the evaluation visit and must demonstrate a commitment to maintain that level of quality prior to the recommendation being made to the VPP Program Administrator, Division of Education and Training. A VPP onsite review team shall return in one year to determine if the program is again maintaining VPP quality in all program elements. If so, the team shall recommend the site be approved to continue participation in the VPP; or
3. Recommendation for termination. The VPP onsite review team shall recommend this action if it finds the site has significantly failed to maintain its safety and health program at STAR quality. A request to the site to

withdraw from the VPP shall precede a recommendation for termination by the VPP Program Administrator, Division of Education and Training.

XIV. GUIDELINES FOR DOCUMENT SUBMISSION

In order to formally apply, an application kit must be obtained from the Director, Division of Education and Training. The following information will be required in The formal application kit:

A. General Information

1. Company Name
 - * Home Address
 - * Site Address
 - * Site CEO
 - * Title
 - * Site VPP Representative
 - * Title
 - * Address
 - * Phone Number
2. Corporation Name (if different)
 - * Corporate VPP Representative (if applicable)
 - * Title
 - * Address
 - * Phone Number
3. Collective Bargaining Agent(s)
 - * Address(es)
 - * Phone Number(s)
4. Number of Employees
 - * Regular
 - * Temporary
 - * Contract Workers
5. Type of Work Performed and Products Produced

6. Industry SIC Code (3-4 digit)

* Site

* Contractor

7. Injury Incidence Rate (for each of last (3) complete calendar years)

8. Lost Workday Injury Case Rate* (for each of last 3 complete calendar years)

* Rate comparisons will be based on the most current National BLS data at the time of receipt of the formal application.

B. Commitment and Planning

1. **Commitment to Safety and Health Protection.**

* Written Policy and Goals: Describe established policies and results-oriented objectives for worker safety and health protection, which have been communicated to all employees.

* Line of Accountability: Describe documented system for holding all line managers and supervisors accountable for safety and health (i.e., job performance and evaluation, etc.) Describe authority and responsibility for safety and health protection that is clearly defined and implemented, including the accountability through evaluation of supervisors, and the system for rewarding good or correcting deficient performances.

* Resources: Define adequate resources including personnel, equipment, and promotions, etc. committed to workplace safety and health.

* Management Involvement: Describe top involvement in worker safety and health concerns,

including clear lines of communication with employees and setting an example of safe and healthful behavior.

- * Contract Worker Coverage: Describe worksite safety and health rules and procedures applicable to contractors and subcontractors, including special precautions necessary as a result of their activities and applicant's procedures for informing contractors of known potential hazards related to or in near proximity to contract work. Define the criteria for evaluation and selection of contractors based on their safety and health programs and performance. Define the contractor's responsibility to the applicant to submit injury and lost workday data, disciplinary procedures, prompt correction and control of known hazards, evaluation of safety and health protection, etc.

2. **Commitment of VPP Participation.**

Explain management's commitment and other assurances including:

- a. Commitment to excel in providing outstanding safety and health protection to employees through management systems and employee involvement.
- b. Commitment to the achievement and maintenance of the STAR Program requirements and to the goals and objectives of the Voluntary Protection Program.
- c. Agreement to provide the information listed below for Kentucky OSH to review onsite and to obtain these records until Kentucky OSH communicates its decision regarding initial VPP participation. agreement to retain comparable records for the period of VPP participation to be covered by each subsequent evaluation until Kentucky OSH

communicates its decision regarding continued approval.

- Written safety and health program
- Tracking records for employee hazard reports
- Self-inspections and accident investigation records
- Safety and health orientation and training records
- Safety committees minutes (as applicable)
- Annual safety and health evaluation
- Monitoring, sampling and analysis records (where applicable)
- OSHA Log and first reports of injury
- Collective bargaining agreement concerning employee participation (where applicable)

d. Company's Trade Secret/Proprietary Information Policy

e. Agreement to correct all hazards identified through self-inspections, employee reports, or accident investigations in a timely manner and provide the results to employees.

f. Agreement to protect any employees with safety-related duties from discriminatory actions resulting from these duties.

g. Agreement to provide Kentucky OSH, each year by March 1, annual injury incidence and lost workday case rates, hours worked, and estimated average employment for the past calendar year separately for regular employees and for applicable onsite contract employees. Agreement to provide a copy of the company's most recent safety and health program evaluation.

- h. Agreement to notify employees, including new hires, about participation in the VPP, their right to register a complaint with Kentucky OSH, and their right to obtain self-inspection and accident investigation results upon request.
 - i. Written employee notification and assistance available (including for new hires).
Include the following:
 - 1. VPP elements and commitment
 - 2. An explanation of VPP and employee rights
 - 3. Hazard correction
 - 4. Non-discrimination
 - 5. Access to self-inspection and accident/
Incidence results
 - 6. Kentucky OSH access to written programs, logs
and any monitoring and sampling results
 - j. Document union/collective bargaining agent's position on site participation in VPP, (if applicable).
3. ***Planning.*** Indicate how safety and health practices are integrated into comprehensive management planning. For contract workers on site, include procedures for pre-job planning and preparation for different phases of construction as the project progresses.
4. ***Written safety and health program.*** List all critical elements, including:
- a. HAZARD ASSESSMENT
 - b. HAZARD CORRECTION AND CONTROL
 - c. SAFETY AND HEALTH TRAINING
 - d. EMPLOYEE PARTICIPATION
 - e. SAFETY AND HEALTH ANNUAL EVALUATIONS

C. Hazard Assessment

Describe the method(s) used by management to determine hazards or potential hazards, such as initial or periodic comprehensive surveys or pre-job planning.

1. **Pre-use Analysis**. Define how new processes, materials, substances, and/or equipment are analyzed before selection and use to determine potential hazards and for prevention or control.
2. **Comprehensive surveys**. Explain the company's method(s) used currently and at the time of design for initial determination of all potential safety and health hazards at the site including:
 - a. Baseline surveys of health hazards accomplished through initial comprehensive industrial hygiene surveying and other comprehensive means of assessment.
 - b. The use of nationally recognized procedures for all sampling, testing, and analysis with written records of results.
3. **Self-inspections**. Describe your written system for conducting self-inspections, including frequency and written results procedures or findings and tracking of hazard correction. Industrial hygiene sampling and monitoring procedures and protocols with a summary of the testing and analysis procedures used and qualifications of person(s) conducting them.
4. **Hazard analysis**. Describe how routine examination and analysis of hazards associated with individual jobs, processes, or phases is accomplished, how management and employees are involved, and how the results are including in training and hazard control programs.
5. **Employee notification of hazards**. Explain the company's system for employees to notify appropriate management personnel about conditions that appear hazardous and mechanisms used for

responding to employees. Also, include tracking and hazard correction procedures.

6. **Accident/incident investigation.** Describe the company's system and procedures for conducting accident/incident investigations. Include:
 - a. Training/and or guidance given to instructors
 - b. Site determination of which accidents to investigate
 - c. Near-miss incident procedures
 - d. Written reports of findings and hazard correction tracking
 - e. Procedures used to analyze illness and trends identifying causes and providing preventive or corrective actions.
7. **Medical program.** Describe the medical program including:
 - a. Availability of physician services
 - b. First aid/CPR other paramedical training for employees and training received
 - c. Special programs offered (i.e., audiometric testing, pre-employment physicals) and reasons necessary
 - d. Use of occupational health professionals for onsite analysis and early recognition and treatment of injury and illness.

D. Hazard Correction and Control

1. **Professional expertise.** Provide details concerning the use of services of certified professionals, including Certified Industrial Hygienists, Certified Safety Professionals, and or Certified Safety Engineers.
2. **Hazard elimination and control.** Describe the means for eliminating or controlling hazards including:
 - a. engineering/administrative controls
 - b. personal protective equipment requirements (i.e., if respirator used, attach a copy of the written program)

- c. safety and health rules including work procedures for specific operations (i.e., process safety management-complete Appendix A, if applicable)
- 3. **Disciplinary system.** Describe the disciplinary actions or re-orientation of employees and supervisors who break or disregard safety rules, safe work, materials handling or emergency procedures.
- 4. **Emergency preparedness.** Describe emergency planning and preparedness program, including information on:
 - a. emergency training drills
 - b. any necessary personal protective equipment
 - c. evacuation and emergency egress plans and interaction with local fire departments/rescue squads
 - d. first aid and medical planning
 - e. emergency telephone numbers
 - f. natural disaster preparedness/crisis preparedness plan
- 5. **Preventative maintenance.** Summarize and briefly describe the procedures for ongoing monitoring and maintenance of workplace equipment to prevent it from becoming hazardous.
- 6. **Hazard correction tracking.** Describe the system for initiating hazard correction in a timely manner.

E. Safety and Health Training

Describe formal and informal safety and health training programs for employees; supervisors, and managers. Include supervisor's training schedules and information on hazard communication, personal protective equipment, and handling of emergency situations. (Attach sample attendance lists and tracking methods, if desired).

F. Employee Participation

1. Safety and health involvement

Employees. Describe the ways employees are involved in the safety and health program, providing specific information about decision processes that employees impact, such as hazard assessment, hazard analysis, safety and health training, and evaluation of safety and health programs.

a. Safety and health committees. Describe.

- method of selecting employee members
- date of committee inception
- name, job, & length of service of each member
- average length of service members
- requirements of committee, including frequency, quorum rules, minutes
- role of committee including responsibility, scope, frequency of inspections, employee hazard notification, accident investigation, and hazard recognition
- safety and health information accessible to and used by the committee

b. Safety observers. Explain role of safety observer, if applicable

c. Ad hoc safety and health problem solving group. Describe procedures for ad hoc problem-solving group, if applicable

d. Safety and health training of other employees. define any safety and health training of other employees on the site

e. Analysis of hazard of job. Describe employee's role

in hazard analysis.

f. Committees that plan and conduct safety and health awareness programs. Explain procedures used by committees that plan and conduct safety

and health awareness programs, including frequency and attendance requirements.

Contractor/subcontractors. Describe the written program for contract worker's safety and health protection who may or may be intermingled with applicant's employees, including training, safe work practices, emergency evacuation/response plans, and notification of appropriate personnel of hazards encountered by contractors. Define authority and documentary evidence for the oversight, coordination, and enforcement of those programs by the applicant.

G. *Safety & health program self-evaluation (annually)*

Define the system for evaluating the operation of the safety and health program annually to determine what changes are needed to improve workers' safety and health. Include:

1. System for providing written narrative reports with recommendations and documentation of follow-up actions.
2. Procedures regarding effectiveness of the operation of the self-inspection system, employee hazard notification system, accident investigation, employee participation, safety and health training, enforcement of safety and health rules, and the coverage of health aspects, including personal protective equipment and routine monitoring and sampling, should be determined and the findings should be used to improve the implementation of the company's written safety and health program.

H. *Other relevant information*

1. Miscellaneous safety and health programs, i.e., first aid and CPR training for spouses, lawn mower safety

at home, safety belt usage, defensive driving classes, fire protection in the home, off-hours safety, insurance audit reports or other programs involving insurance carriers, recycling waste reduction, community action/involvement.

2. Good faith. Provide information regarding previous Kentucky OSH inspections/interaction records.
3. Site plan. Attach a site map or general plant layout.

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